



CRIMINAL COMPLAINT
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. Lizeth MATA ; DOB: 1997; United States Dalila GALVAN ; DOB: 2001; United States	DOCKET NO. MAGISTRATE'S CASE NO. 23-00056MJ
Complaint for violations of Title 8, United States Code, Sections 1324(a)(1)(A) (ii), 1324(a)(1)(A)(v)(I), 1324(a)(1)(B)(i)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about January 28, 2023, in the District of Arizona, Lizeth MATA and Dalila GALVAN , named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, including Miguel Cuevas-Hernandez, and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On or about January 28, 2023, in the District of Arizona (Naco), a United States Border Patrol Agent (BPA) operating a Mobile Surveillance Capable (MSC) vehicle observed a white 2021 Toyota Camry drive south on Paloma Trail to Casabel Pass. Paloma Trail is documented pick-up location heavily utilized by Trans-National Organization for alien smuggling. The MSC operator reported observed four suspected Undocumented Non-Citizens (UNCs) exited the brush and entered the Camry. The vehicle drove northbound towards State Route (SR) 92 and turned onto it. A BPA was observing traffic at the intersection of Paloma Trail and SR 92 when they observed a single vehicle approach the intersection and turn eastbound. The MSC operator maintained visual of the Camry and informed the BPA at the intersection it was the same vehicle they saw load up. The BPA got behind the Camry to conduct a vehicle stop and immigration inspection. The BPA approached the vehicle and observed the driver, later identified as Lizeth MATA , a front seat passenger, later identified as Dalila GALVAN , and four subjects dressed in camouflaged clothing in the rear seats. MATA and GALVAN stated they were United States citizens. The four rear occupants, including Miguel Cuevas-Hernandez, were determined to be Mexican citizens, illegally present in the United States. MATA was <i>Mirandized</i> on-scene and stated she knew she was alien smuggling and was doing it for financial reasons. A consent search of MATA's cellphone revealed messages pertaining to smuggling events. Records checks revealed Miguel Cuevas-Hernandez did not have the proper immigration documentation to enter or remain in the United States legally. Material witness Cuevas stated he made arrangements to be smuggled into the United States for money. He crossed the International Boundary Fence with a group and wore camouflaged clothing and carpet booties to conceal his movement through the brush. Cuevas stated he was guided through the brush via cellphone. They received a call and told what vehicle to get in. Cuevas described the vehicle as a white four-door car with a female driver and female passenger. The passenger instructed them to take off their camouflaged clothing. Cuevas positively identified GALVAN as the passenger in the vehicle that picked him up.	
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MATERIAL WITNESSES IN RELATION TO THE CHARGE: Miguel Cuevas-Hernandez	
Detention Requested <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>	SIGNATURE OF COMPLAINANT 
	OFFICIAL TITLE Border Patrol Agent
Sworn by telephone <u> x </u>	
SIGNATURE OF MAGISTRATE JUDGE 	DATE January 30, 2023

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED:

In a post-*Miranda* statement, **MATA** stated she is from Vado, New Mexico and was in the Naco area to make some money. When asked how, **MATA** stated she was approached at a house party about one year ago and given a phone number and told she could make money picking up 'illegal aliens'. **MATA** stated she has performed several smuggling events in the Naco area and has transported them to various locations in Phoenix, Arizona. **MATA** stated she was initially paid \$700 per UNC but was now being paid \$1000 per UNC. **MATA** states she has made approximately \$20,000 from numerous smuggling events.

In a post-*Miranda* statement, **GALVAN** initially stated she and **MATA** were traveling from New Mexico to Arizona to pick up a friend in from Glendale and return to New Mexico to visit family. When asked about the unusual route they took to get to Glendale which adds approximately two hours forty-seven minutes to their trip, **GALVAN** stated **MATA** knew Arizona well and would be taking back roads to the highway. A consent search of her cellphone revealed several chat threads documenting human smuggling. When **GALVAN** was presented with this information, **GALVAN** recanted her original story and admitted she and **MATA** were in the area 'picking up illegals'.